

United States Bankruptcy Court  
Middle District of Pennsylvania

In re:  
Oscar Enrique Parra  
Kari Lyn Parra  
Debtors

Case No. 19-02858-HWV  
Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0314-1

User: JGoodling  
Form ID: pdf002

Page 1 of 2  
Total Noticed: 50

Date Rcvd: Sep 16, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 18, 2019.

db/jdb +Oscar Enrique Parra, Kari Lyn Parra, 417 Kraiss Avenue, Chambersburg, PA 17201-3766  
5218098 +COMCAST CABLE (BK Notices), 676 ISLAND POND ROAD, MANCHESTER, NH 03109-4840  
5218100 CREDIT FIRST NATL ASSOC, PO BOX 81344, CLEVELAND, OH 44188-0344  
5231585 Capital One, N.A., c/o Becket and Lee LLP, PO Box 3001, Malvern PA 19355-0701  
5218103 +DSNB MACYS, BK NOTICES, PO BOX 8053, MASON, OH 45040-8053  
5218106 +FBCS INC, 2200 BYBERRY RD, STE 120, HATBORO, PA 19040-3739  
5218109 +JPMCB CARD, PO BOX 15369, WILMINGTON, DE 19850-5369  
5218111 MANLEY DEAS KOCHALSKI LLC, PO BOX 165028, COLUMBUS, OH 43216-5028  
5218112 +MCCEARY HEATING AND COOLING, 198 SUNSET BLVD E, CHAMBERSBURG, PA 17202-7953  
5218115 +MR COOPER, 8950 CYPRESS WATERS BLVD, DALLAS, TX 75019-4620  
5236902 +Nationstar Mortgage LLC d/b/a Mr. Cooper, Attention: Bankruptcy Department, PO Box 619096, Dallas TX 75261-9096  
5218117 ONEMAIN FINANCIAL (BK Real Estate), PO BOX 6043, SIOUX FALLS, SD 57117-6043  
5218119 +PEERLESS CREDIT SERVICES, INC, PO BOX 518, MIDDLETOWN, PA 17057-0518  
5218122 +SUMMIT PHYSICIAN SERVICES, 785 5TH AVE, STE 3, CHAMBERSBURG, PA 17201-4232  
5218127 +THE STORAGE HOUSE, 440 MOWER ROAD, CHAMBERSBURG, PA 17202-8150  
5218128 +UNEMP COMP OVERPAYMENT MATTERS, DEPT OF L&I - OFFICE OF CHIEF COUNSEL,  
651 BOAS STREET 10TH FLOOR, HARRISBURG, PA 17121-0751  
5218129 +UNEMPL COMP TAX MATTERS, HARRISBURG CASES L&I OFF CHIEF COUNSEL, 651 BOAS STREET 10TH FLOOR,  
HARRISBURG, PA 17121-0751

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

cr +E-mail/PDF: PRA\_BK2\_CASE\_UPDATE@portfoliorecovery.com Sep 16 2019 19:40:56  
PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021  
5218092 +E-mail/Text: ally@ebn.phinsolutions.com Sep 16 2019 19:33:43 ALLY, PO BOX 130424,  
ROSEVILLE, MN 55113-0004  
5218093 +E-mail/Text: legal@arsnational.com Sep 16 2019 19:35:18 ARS NATIONAL SERVICES, INC,  
PO BOX 469046, ESCONDIDO, CA 92046-9046  
5218094 E-mail/PDF: AIS.cocard.ebn@americaninfosource.com Sep 16 2019 19:41:15  
CAPITAL ONE (BANKRUPTCY NOTIFICATION) (p, PO BOX 30285, SALT LAKE CITY, UT 84130-0285  
5218095 +E-mail/Text: bankruptcy@cavps.com Sep 16 2019 19:35:48 CAVALRY SPV I LLC,  
ATT ANDREW ZARO CEO & PRESIDENT, 500 SUMMIT LAKE DR, STE 400, VALHALLA, NY 10595-2321  
5218096 E-mail/Text: BNC-ALLIANCE@QUANTUM3GROUP.COM Sep 16 2019 19:35:24 CB/VICSCRT,  
ATTN: BANKRUPTCY NOTICES, PO BOX 182125, COLUMBUS, OH 43218-2125  
5218097 +E-mail/Text: dehartstarr@pamdl3trustee.com Sep 16 2019 19:35:53 CHARLES J DEHART, III, ESQ.,  
8125 ADAMS DRIVE STE A, HUMMELSTOWN PA 17036-8625  
5218099 E-mail/Text: RVSCBICNOTICE1@state.pa.us Sep 16 2019 19:35:30 COMM OF PA DEPT OF REVENUE,  
BUREAU OF COMPLIANCE, PO BOX 280946, HARRISBURG, PA 17128-0946  
5218101 E-mail/PDF: creditonebknotifications@resurgent.com Sep 16 2019 19:40:58 CREDITONE BANK,  
CUSTOMER BILLING AND CORRESPONDENCE, PO BOX 98873, LAS VEGAS, NV 89193-8873  
5242869 +E-mail/Text: bankruptcy@cavps.com Sep 16 2019 19:35:48 Cavalry SPV I, LLC,  
500 Summit Lake Drive, Ste 400, Valhalla, NY 10595-2321  
5218102 +E-mail/Text: bankruptcynotices@dcollect.com Sep 16 2019 19:35:55 DIVERSIFIED,  
PO BOX 551268, JACKSONVILLE, FL 32255-1268  
5218104 E-mail/Text: operationsclerk@easypayfinance.com Sep 16 2019 19:33:40 EASYPAY/DVRA,  
2701 LOKER AVE WEST, CARLSBAD, CA 92008  
5218105 +E-mail/Text: bknotice@ercbpo.com Sep 16 2019 19:35:42 ERC, PO BOX 57547,  
JACKSONVILLE, FL 32241-7547  
5218107 E-mail/Text: cio.bnmail@irs.gov Sep 16 2019 19:35:12 INTERNAL REVENUE SERVICE - CIO,  
PO BOX 7346, PHILADELPHIA, PA 19101-7346  
5218110 +E-mail/Text: bncnotices@becket-lee.com Sep 16 2019 19:35:07 KOHLS/CAPONE,  
COLLECTION DEPARTMENT, PO BOX 3084, MILWAUKEE, WI 53201-3084  
5218113 +E-mail/Text: bankruptcydpt@mcmcg.com Sep 16 2019 19:35:34 MIDLAND CREDIT MANAGEMENT, INC.,  
2365 NORTHSIDE DR, STE 300, SAN DIEGO, CA 92108-2709  
5218114 +E-mail/Text: bankruptcydpt@mcmcg.com Sep 16 2019 19:35:34 MIDLAND FUNDING LLC,  
2365 NORTHSIDE DR STE 300, SAN DIEGO, CA 92108-2709  
5241831 +E-mail/Text: bankruptcydpt@mcmcg.com Sep 16 2019 19:35:34 Midland Funding LLC,  
PO Box 2011, Warren, MI 48090-2011  
5218116 +E-mail/Text: Bankruptcies@nragroup.com Sep 16 2019 19:36:06 NATIONAL RECOVERY AGENCY,  
2491 PAXTON STREET, HARRISBURG, PA 17111-1036  
5242456 E-mail/Text: jennifer.chacon@spservicing.com Sep 16 2019 19:36:07 Onyx Bay Trust,  
c/o Select Portfolio Servicing, Inc., P.O. Box 65250, Salt Lake City, UT 84165-0250  
5218118 +E-mail/Text: bankruptcy@patriotfcu.org Sep 16 2019 19:35:43 PATRIOT FEDERAL CREDIT UNI,  
800 WAYNE AVE, CHAMBERSBURG, PA 17201-3810  
5218120 E-mail/PDF: PRA\_BK2\_CASE\_UPDATE@portfoliorecovery.com Sep 16 2019 19:41:44  
PORTFOLIO RECOVERY ASSOCIATES LLC, BK NOTICES, PO BOX 41067, NORFOLK, VA 23541  
5244474 E-mail/PDF: PRA\_BK2\_CASE\_UPDATE@portfoliorecovery.com Sep 16 2019 19:40:57  
PORTFOLIO RECOVERY ASSOCIATES, LLC, P O B 41067, NORFOLK, VA 23541  
5244188 E-mail/PDF: PRA\_BK2\_CASE\_UPDATE@portfoliorecovery.com Sep 16 2019 19:40:56  
Portfolio Recovery Associates, LLC, POB 12914, Norfolk VA 23541  
5242920 +E-mail/Text: bankruptcy@patriotfcu.org Sep 16 2019 19:35:43 Patriot Federal Credit Union,  
PO Box 778, Chambersburg, PA 17201-0778

District/off: 0314-1

User: JGoodling  
Form ID: pdf002

Page 2 of 2  
Total Noticed: 50

Date Rcvd: Sep 16, 2019

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center  
(continued)

5237302	E-mail/Text: bnc-quantum@quantum3group.com Sep 16 2019 19:35:26 Quantum3 Group LLC as agent for, Crown Asset Management LLC, PO Box 788, Kirkland, WA 98083-0788	
5218121	+E-mail/Text: EBN_Greensburg@Receivemorermp.com Sep 16 2019 19:36:09 TEMPLE, PA 19560-0329	RMP, PO BOX 329,
5218123	+E-mail/PDF: gecscedi@recoverycorp.com Sep 16 2019 19:40:52 ORLANDO, FL 32896-5005	SYNCB/AMEG, PO BOX 965005,
5218124	E-mail/PDF: gecscedi@recoverycorp.com Sep 16 2019 19:40:52 PO BOX 965060, ORLANDO, FL 32896-5060	SYNCB/JCP, BK NOTICES,
5218125	+E-mail/PDF: gecscedi@recoverycorp.com Sep 16 2019 19:41:40 ORLANDO, FL 32896-5004	SYNCB/LOWES, PO BOX 965004,
5218126	+E-mail/PDF: gecscedi@recoverycorp.com Sep 16 2019 19:40:52 ORLANDO, FL 32896-5024	SYNCB/WALMART, PO BOX 965024,
5218631	+E-mail/PDF: gecscedi@recoverycorp.com Sep 16 2019 19:41:14 c/o PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021	Synchrony Bank,
5218130	+E-mail/Text: bkrpt21@maxprofitsys.com Sep 16 2019 19:35:32 PO BOX 2162, HAGERSTOWN, MD 21742-2162	VALLEY CREDIT SERVICE INC,

TOTAL: 33

\*\*\*\*\* BYPASSED RECIPIENTS (undeliverable, \* duplicate) \*\*\*\*\*

5242400*	Capital One, N.A., c/o Becket and Lee LLP, PO Box 3001, Malvern PA 19355-0701
5218108*	IRS CENTRALIZED INSOLVENCY ORGANIZATION, PO BOX 7346, PHILADELPHIA, PA 19101-7346

TOTALS: 0, \* 2, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 18, 2019

Signature: /s/Joseph Speetjens

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 16, 2019 at the address(es) listed below:

Charles J DeHart, III (Trustee) TWecf@pamd13trustee.com  
Dorothy L Mott on behalf of Debtor 2 Kari Lyn Parra DorieMott@aol.com,  
KaraGendronECF@gmail.com;mottgendronecf@gmail.com;bethsnyderecf@gmail.com  
Dorothy L Mott on behalf of Debtor 1 Oscar Enrique Parra DorieMott@aol.com,  
KaraGendronECF@gmail.com;mottgendronecf@gmail.com;bethsnyderecf@gmail.com  
James Warmbrodt on behalf of Creditor Select Portfolio Servicing, Inc.  
bkgroup@kmllawgroup.com  
Kara Katherine Gendron on behalf of Debtor 2 Kari Lyn Parra karagendronecf@gmail.com,  
doriemott@aol.com;mottgendronecf@gmail.com;bethsnyderecf@gmail.com  
Kara Katherine Gendron on behalf of Debtor 1 Oscar Enrique Parra karagendronecf@gmail.com,  
doriemott@aol.com;mottgendronecf@gmail.com;bethsnyderecf@gmail.com  
Karina Velter on behalf of Creditor NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER  
amps@manleydeas.com  
United States Trustee ustpregion03.ha.ecf@usdoj.gov

TOTAL: 8

**LOCAL BANKRUPTCY FORM 3015-1**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CHAPTER 13**  
**OSCAR ENRIQUE PARRA** :  
**KARI LYN PARRA** : **CASE NO. 1:19-bk-02858**  
**Debtors** :  
:  ORIGINAL PLAN  
:  AMENDED PLAN (indicate 1ST, 2ND,  
: 3RD, etc.)  
:  0 Number of Motions to Avoid Liens  
:  0 Number of Motions to Value Collateral

**CHAPTER 13 PLAN**

**NOTICES**

Debtors must check one box on each line to state whether or not the plan includes each of the following items. If an item is checked as "Not Included" or if both boxes are checked or if neither box is checked, the provision will be ineffective if set out later in the plan.

<b>1</b>	The plan contains nonstandard provisions, set out in § 9, which are not included in the standard plan as approved by the U.S. Bankruptcy Court for the Middle District of Pennsylvania.	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not Included
<b>2</b>	The plan contains a limit on the amount of a secured claim, set out in § 2.E, which may result in a partial payment or no payment at all to the secured creditor.	<input type="checkbox"/> 0 Included	<input checked="" type="checkbox"/> Not Included
<b>3</b>	The plan avoids a judicial lien or nonpossessory, nonpurchase-money security interest, set out in § 2.G.	<input type="checkbox"/> 0 Included	<input checked="" type="checkbox"/> Not Included

**YOUR RIGHTS WILL BE AFFECTED**

READ THIS PLAN CAREFULLY. If you oppose any provision of this plan, you must file a timely written objection. This plan may be confirmed and become binding on you without further notice or hearing unless a written objection is filed before the deadline stated on the Notice issued in connection with the filing of the plan.

## 1. PLAN FUNDING AND LENGTH OF PLAN.

### A. Plan Payments From Future Income

1. To date, the Debtor paid \$0 (enter \$0 if no payments have been made to the Trustee to date). Debtor shall pay to the Trustee for the remaining term of the plan the following payments. If applicable, in addition to monthly plan payments, Debtor shall make conduit payments through the Trustee as set forth below. The total base plan is \$18,000.00, plus other payments and property stated in § 1B below:

Start mm/yy	End mm/yy	Plan Payment	Estimated Conduit Payment	Total Payment	Total Payment Over Plan Tier
08/2019	07/2024	\$300.00 x 60 months	\$		\$18,000.00
		\$	\$		\$
		\$	\$		\$
		\$	\$		\$
		\$	\$		\$
				Total Payments	\$18,000.00

2. If the plan provides for conduit mortgage payments, and the mortgagee notifies the Trustee that a different payment is due, the Trustee shall notify the Debtor and any attorney for the Debtor, in writing, to adjust the conduit payments and the plan funding. Debtor must pay all post-petition mortgage payments that come due before the initiation of conduit mortgage payments.

3. Debtor shall ensure that any wage attachments are adjusted when necessary to conform to the terms of the plan.

4. CHECK ONE:  Debtor is at or under median income. If this line is checked, the rest of § 1.A.4 need not be completed or reproduced.

### B. Additional Plan Funding From Liquidation of Assets/Other

1. The Debtor estimates that the liquidation value of this estate is \$. (Liquidation value is calculated as the value of all non-exempt assets after the deduction of valid liens and encumbrances and before the deduction of Trustee fees and priority claims.)

Check one of the following two lines.

No assets will be liquidated. If this line is checked, the rest of § 1.B need not be completed or reproduced.

## 2. SECURED CLAIMS

### A. Pre-Confirmation Distributions. Check one.

None. If "None" is checked, the rest of § 2.A need not be completed or reproduced.

### B. Mortgages (Including Claims Secured by Debtor's Principal Residence) and Other Direct Payments by Debtor. Check one.

None. If "None" is checked, the rest of § 2.B need not be completed or reproduced. \

Payments will be made by the Debtor directly to the creditor according to the original contract terms, and without modification of those terms unless otherwise agreed to by the contracting parties. All liens survive the plan if not avoided or paid in full under the plan.

Name of Creditor	Description of Collateral	Last Four Digits of Account Number
ALLY	2012 Kia Sorento LX 4d, white (approx. 105,000 mil)	
MR COOPER	417 Kraiss Ave, Chambersburg, PA 17201	
ONEMAIN FINANCIAL (BK Real Estate)	417 Kraiss Ave, Chambersburg, PA 17201	

**C. Arrears (Including, but not limited to, claims secured by Debtor's principal residence).**

*Check one.*

None. If "None" is checked, the rest of § 2.C need not be completed or reproduced.

The Trustee shall distribute to each creditor set forth below the amount of arrearages in the allowed proof of claim. If post-petition arrears are not itemized in an allowed claim, they shall be paid in the amount stated below. Unless otherwise ordered, if relief from the automatic stay is granted as to any collateral listed in this section, all payments to the creditor as to that collateral shall cease, and the claim will no longer be provided for under § 1322(b)(5) of the Bankruptcy Code:

Name of Creditor	Description of Collateral	Estimated Pre-petition Arrears to be Cured	Estimated Post-petition Arrears to be Cured	Estimated Total to be paid in plan
ALLY	2012 Kia Sorento LX 4d, white (approx. 105,000 mil)	Per allowed proof of claim \$0 estimated		Per allowed proof of claim
MR COOPER	417 Kraiss Ave, Chambersburg, PA 17201	Per allowed proof of claim \$10,000.00 estimated		Per allowed proof of claim
ONEMAIN FINANCIAL (BK Real Estate)	417 Kraiss Ave, Chambersburg, PA 17201	Per allowed proof of claim \$0 estimated		Per allowed proof of claim

**D. Other secured claims (conduit payments and claims for which a § 506 valuation is not applicable, etc.)**

None. If "None" is checked, the rest of § 2.D need not be completed or reproduced.

**E. Secured claims for which a § 506 valuation is applicable. Check one.**

None. If "None" is checked, the rest of § 2.E need not be completed or reproduced.

**F. Surrender of Collateral. Check one.**

None. If "None" is checked, the rest of § 2.F need not be completed or reproduced.

**G. Lien Avoidance. Do not use for mortgages or for statutory liens, such as tax liens. Check one.**

None. If "None" is checked, the rest of § 2.G need not be completed or reproduced.

### **3. PRIORITY CLAIMS.**

#### **A. Administrative Claims**

1. Trustee's Fees. Percentage fees payable to the Trustee will be paid at the rate fixed by the United States Trustee.

2. Attorney's fees. Complete only one of the following options:

a. In addition to the retainer of \$0.00 already paid by the Debtor, the amount of \$4,000.00 in the plan. This represents the unpaid balance of the presumptively reasonable fee specified in L.B.R. 2016-2(c); or

b. \$ \_\_\_\_\_ per hour, with the hourly rate to be adjusted in accordance with the terms of the written fee agreement between the Debtor and the attorney. Payment of such lodestar compensation shall require a separate fee application with the compensation approved by the Court pursuant to L.B.R. 2016-2(b).

3. Other. Other administrative claims not included in §§ 3.A.1 or 3.A.2 above. *Check one of the following two lines.*

None. If "None" is checked, the rest of § 3.A.3 need not be completed or reproduced.

#### **B. Priority Claims (including, certain Domestic Support Obligations)**

Allowed unsecured claims entitled to priority under § 1322(a) will be paid in full unless modified under §9.

Name of Creditor	Estimated Total Payment
<b>IRS CENTRALIZED INSOLVENCY ORGANIZATION</b>	<b>\$5,435.00 estimated Per allowed proof of claim</b>

#### **C. Domestic Support Obligations assigned to or owed to a governmental unit under 11 U.S.C.**

**§507(a)(1)(B).** *Check one of the following two lines.*

If "None" is checked, the rest of § 3.C need not be completed or reproduced.

### **4. UNSECURED CLAIMS**

**A. Claims of Unsecured Nonpriority Creditors Specially Classified.** *Check one of the following two lines.*

None. If "None" is checked, the rest of § 4.A need not be completed or reproduced.

**B. All remaining allowed unsecured claims shall receive a pro-rata distribution of any funds remaining after payment of the other classes.**

### **5. EXECUTORY CONTRACTS AND UNEXPIRED LEASES.**

*Check one of the following two lines.*

None. If "None" is checked, the rest of § 5 need not be completed or reproduced.

The following contracts and leases are assumed (and arrears in the allowed claim to be cured in the plan) or rejected:

Name of Other Party	Description of Contract or Lease	Monthly Payment	Interest Rate	Estimated Arrears	Total Plan Payment	Assume/Reject
<b>THE STORAGE HOUSE</b>	<b>Lease of storage space</b>	\$270.00	%	\$0		Assumed

### **6. VESTING OF PROPERTY OF THE ESTATE.**

**Property of the estate will vest in the Debtor upon**

*Check the applicable line:*

plan confirmation.

entry of discharge.

closing of case:

**7. DISCHARGE:** (Check one)

- The debtor will seek a discharge pursuant to § 1328(a).  
 The debtor is not eligible for a discharge because the debtor has previously received a discharge described in § 1328(f).

**8. ORDER OF DISTRIBUTION:**

If a pre-petition creditor files a secured, priority or specially classified claim after the bar date, the Trustee will treat the claim as allowed, subject to objection by the Debtor.

Payments from the plan will be made by the Trustee in the following order:

- Level 1: Adequate protection payments.  
Level 2: Debtor's attorney's fees.  
Level 3: Domestic Support Obligations.  
Level 4: Secured claims, pro rata.  
Level 5: Priority claims, pro rata.  
Level 6: Specially classified unsecured claims.  
Level 7: General unsecured claims.  
Level 8: Untimely filed unsecured claims to which the debtor has not objected.

*If the above Levels are filled in, the rest of § 8 need not be completed or reproduced.*

**9. NONSTANDARD PLAN PROVISIONS**

**Include the additional provisions below or on an attachment. Any nonstandard provision placed elsewhere in the plan is void. (NOTE: The plan and any attachment must be filed as one document, not as a plan and exhibit.)**

- (1) Claim amounts: The amounts of the claims listed in the plan and schedules are estimated amounts and are not admissions by the Debtors as to the amount(s) owed.  
(2) Property surrendered under Section 2 F. shall be surrendered in full satisfaction of creditors' claims.  
(3) Lien Releases.  
    (a) Personal Property: Upon the satisfaction, completion of cramdown payment, or other discharge of a security interest in a motor vehicle, mobile home, or in any other personal property of this estate in bankruptcy for which ownership is evidenced by a certificate of title, the secured party shall within thirty (30) days after the entry of the discharge order or demand execute a release of its security interest on the said title or certificate, and mail or deliver the certificate or title and release to the Debtor or to the attorney for the Debtor. Confirmation of this plan shall impose an affirmative and direct duty on each such secured party to comply with this provision.  
    (b) Real Property: Upon the, completion of cramdown payment, strip off, or other discharge of a security interest in real property, the secured party shall within sixty (60) days after the entry of the discharge order file a satisfaction piece or release of its security interest in the office of the Recorder of Deeds for the county in which the real estate is located. Confirmation of this plan shall impose an affirmative and direct duty on each such secured party to comply with this provision.  
(4) Confirmation of this Plan shall not bar the Debtor from:  
    (a) filing objections to any claims;  
    (b) amending his schedules to add a creditor who was omitted from his schedules and to amend this Plan to provide for the treatment of such creditor or any other creditor who failed to timely file a proof of claim;

- (c) seeking to avoid a lien under Section 522 of the Code or seeking the determination of the extent, validity and/or priority of any liens;
- (d) seeking a determination as to the dischargeability of any debt; or
- (e) selling any asset of his free and clear of liens and encumbrances.

/s/ Dorothy L. Mott, /s/ Kara K. Gendron

Dorothy L. Mott, Kara K. Gendron  
Attorneys for Debtor(s)

/s/ Oscar Enrique Parra  
Debtor

/s/ Kari Lyn Parra  
Joint Debtor

By filing this document, the debtor, if not represented by an attorney, or the Attorney for Debtor also certifies that this plan contains no nonstandard provisions other than those set out in § 9